

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Martha Jane Toy, Individually and as Executrix	)	
and personal representative of	)	
Estate of Russell B. Toy,	)	
Plaintiffs,	)	
v.	)	C. A. No. 05-cv-760(JJF)
Plumbers & Pipefitters Local No. 74 Pension Plan,	)	
Trustees of Plumbers & Pipefitters Local No. 74	)	
Pension Plan, Plan Administrators of Pension Plan,	)	
Health and Welfare Plan Local No. 74,	)	
an employee welfare benefit plan,	)	
Life Insurance Plan Local No. 74,	)	
an employee welfare benefit plan,	)	
Trustees of Health and Welfare Plan Local No. 74,	)	
Plan Administrators of Health & Welfare Plan, and)	)	
Plan Administrators of Insurance Plan,	)	
Defendants.	)	

---

**NOTICE OF APPEARANCE  
OF JOHN M. STULL, ESQUIRE**

---

I hereby give Notice that John M. Stull, Esquire, enters his appearance on behalf of Plaintiffs Martha Jane Toy and the Estate of Russell B. Toy in the above matter.

/s/ John M. Stull  
John M. Stull, Esquire (# 568)  
Law Offices of John M. Stull, Esquire  
1300 N. Market Street  
Suite 700  
Wilmington, DE 19801  
Ph. (302) 654-0399  
Attorney for Plaintiffs

Dated: November 14, 2005

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Martha Jane Toy, Individually and as Executrix	)	
and personal representative of	)	
Estate of Russell B. Toy,	)	
Plaintiffs,	)	
v.	)	C. A. No. 05-cv-760(JJF)
Plumbers & Pipefitters Local No. 74 Pension Plan,	)	
Trustees of Plumbers & Pipefitters Local No. 74	)	
Pension Plan, Plan Administrators of Pension Plan,	)	
Health and Welfare Plan Local No. 74,	)	
an employee welfare benefit plan,	)	
Life Insurance Plan Local No. 74,	)	
an employee welfare benefit plan,	)	
Trustees of Health and Welfare Plan Local No. 74,	)	
Plan Administrators of Health & Welfare Plan, and	)	
Plan Administrators of Insurance Plan,	)	
Defendants.	)	

---

**DECLARATION OF JOHN M. STULL, ESQUIRE IN SUPPORT OF  
PRO HAC VICE ADMISSION OF WILLIAM B. HILDEBRAND, ESQUIRE  
MOTION AND ORDER**

---

John M. Stull, Esq. (Bar No. 568)  
1300 N. Market Street  
Suite 700  
P. O. Box 1947  
Wilmington, DE 19899  
Ph. (302) 654-0399  
Attorney for Plaintiffs

JOHN M. STULL, pursuant to 28 U.S.C. Section 1746, under penalty of perjury, declares as follows:

1. I am a Solo practitioner of the law firm of John M. Stull, Esquire, with offices in Wilmington, DE. I am admitted, practicing and in good standing in the States of Delaware, District of Columbia and Iowa, and the United States Courts of District of Delaware, Third Circuit Court of Appeals and U. S. Supreme Court.

2. I am satisfied that William B. Hildebrand, Esquire, is a member of good standing of Bars of Pennsylvania, New Jersey, the District Courts of New Jersey and Pennsylvania, and of Third Circuit Court of Appeals and U. S. Supreme Court.

3. I acknowledge that I am bound by Local (D. Del.) Rule 83.5, .6 and .7.

4. I request that Mr. Hildebrand be permitted to appear *pro hac vice* as co-counsel for Plaintiff in order that he may participate in the representation of Plaintiffs.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 14, 2005, in New Castle County, Delaware.

/s/ John M. Stull  
John M. Stull, Esq. (Bar No. 568)  
1300 N. Market Street  
Suite 700  
Wilmington, DE 19801  
Ph. (302) 654-0399  
Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Martha Jane Toy, Individually and as Executrix                     )  
and personal representative of   )  
Estate of Russell B. Toy,   )  
   )  
   ) C. A. No. 05-cv-760(JJF)  
v.   )  
Plumbers & Pipefitters Local No. 74 Pension Plan,                     )  
Trustees of Plumbers & Pipefitters Local No. 74                     )  
Pension Plan, Plan Administrators of Pension Plan,)                     )  
Health and Welfare Plan Local No. 74,                                     )  
an employee welfare benefit plan,   )  
Life Insurance Plan Local No. 74,   )  
an employee welfare benefit plan,   )  
Trustees of Health and Welfare Plan Local No. 74,                     )  
Plan Administrators of Health & Welfare Plan, and)                     )  
Plan Administrators of Insurance Plan,                                     )  
Defendants.   )

---

**MOTION AND ORDER FOR  
PRO HAC VICE ADMISSION OF WILLIAM B. HILDEBRAND, ESQUIRE**

---

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission pro hac vice of William B. Hildebrand, Esquire, to represent Plaintiffs in this matter.

/s/ John M. Stull  
John M. Stull, Esq. (Bar No. 568)  
1300 N. Market Street  
Suite 700  
P. O. Box 1947  
Wilmington, DE 19899  
Ph. (302) 654-0399  
Attorney for Plaintiffs

Date: November 14, 2005

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission pro hac  
vice is granted.

Date: \_\_\_\_\_

---

United States District Judge

## **CERTIFICATION OF COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of New Jersey, Pennsylvania, the District Courts of New Jersey and Pennsylvania, the Third Circuit and the Supreme Court. Pursuant to Local Rule 83.6 I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify I am generally familiar with this Court's Local Rules.

Signed: /s/ William B. Hildebrand  
William B. Hildebrand, Esquire  
Law Offices of William B. Hildebrand, L.L.C.  
1040 Kings Highway North  
Suite 601  
Cherry Hill, NJ 08034  
[WHILDEBRAND1@COMCAST.NET](mailto:WHILDEBRAND1@COMCAST.NET)

Date: November 14, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2005, a copy of the foregoing Notice of Motion for Pro Hac Vice Admission of William B. Hildebrand, Esquire, Declaration of John M. Stull, Esquire in Support of Pro Hac Vice Admission, Certification of William B. Hildebrand, Esquire and proposed Order Granting Pro Hac Vice Admission was served, via e-mail, to the following:

Timothy J. Snyder, Esquire  
Young Conaway Stargatt & Taylor LLP  
1100 West Street, Ste 1700  
P. O. Box 391  
Wilmington, DE 19899  
tsnyder@ycst.com

/s/ John M. Stull  
John M. Stull, Esq. (#568)  
1300 North Market Street  
Suite 700  
Wilmington, DE 19801  
[jstullesq@aol.com](mailto:jstullesq@aol.com)